

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

-v-

JAMES P. LOFTON,

Defendant.

No. 22 CR 581

Honorable Judge Manish S. Shah

**UNOPPOSED MOTION TO
MODIFY CONDITIONS OF RELEASE**

NOW COMES Defendant, JAMES LOFTON, by and through his attorney, DALTON LAW, LLC, and pursuant to 18 U.S.C. § 3142, respectfully moves this Honorable Court to modify his conditions of release. In support thereof, Mr. Lofton offers the following:

1. Mr. Lofton has been on pre-trial release for almost one year without incident. He is doing remarkably well at the Bryn Mawr Care facility.
2. Mr. Lofton is requesting permission to travel to visit his family friend, Rondell, this Saturday, April 12, 2025. His friend resides at 2815 W. 79th Street.
3. Mr. Lofton would be taking the bus via disability bus pass. This would make the trip about an hour and a half each way. For that reason, he is requesting permission to travel between 9a.m. and 6p.m.
4. AUSA Sushma Raju has no objection to the instant motion put forth.

5. Pre-Trial Services Officer Samuel Schroeder similarly does not oppose the request to modify.

WHEREFORE, Defendant JAMES LOFTON respectfully requests that this Honorable Court modify his conditions of release to permit him to travel to visit a friend on April 12, 2025 from 9:00a.m. to 6:00p.m.

Respectfully submitted,

s/ *Blaire C. Dalton*

Blaire C. Dalton
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CERTIFICATE OF SERVICE

I, Blaire C. Dalton, an attorney for Defendant, hereby certifies that on this, the 11th day of April, 2025, I filed the above-described document on the CM-ECF system of the United States District Court for the Northern District of Illinois, which constitutes service of the same.

Respectfully submitted,

/s Blaire C. Dalton